

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:
*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*
Case No. 18-op-45090

and

*The County of Cuyahoga v. Purdue Pharma
L.P., et al.*
Case No. 1:18-op-45004

MDL No. 2804

Hon. Judge Dan A. Polster

**DECLARATION OF EMILY S. ULLMAN IN SUPPORT OF DEFENDANTS' REPLY IN
SUPPORT OF THEIR MOTION TO EXCLUDE EXPERT TESTIMONY OF
KATHERINE KEYES, ANNA LEMBKE & JONATHAN GRUBER RE THE
"GATEWAY HYPOTHESIS" OF CAUSATION**

I, Emily S. Ullman, declare as follows:

1. I am a partner at the law firm of Covington & Burling LLP and counsel to Defendant McKesson Corporation in this action.
2. I make this declaration to place before the Court certain materials relied on in Defendants' Reply in Support of Their Motion to Exclude Expert Testimony of Katherine Keyes, Anna Lembke & Jonathan Gruber Re The "Gateway Hypothesis" of Causation.
3. Attached as **Exhibit 1** is a true and correct copy of a Letter from Harvey A. Siegal, Am Fam Physician. 2003 Dec 1;68(11):2134, *published in reply to* Letter from Erik W.

Gunderson, No data to show link between opioid abuse and heroin use. Am Fam Physician.
2003 Dec 1;68(11):2134.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of August 2019, in Washington, D.C.

/s/ *Emily S. Ullman*
EMILY S. ULLMAN